

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ROSS MCLELLAN,
Defendant

No. 16-10094-LTS

**MOTION FOR LEAVE TO FILE 27-PAGE RENEWED MOTION FOR JUDGMENT OF
ACQUITTAL AND IN THE ALTERNATIVE MOTION FOR NEW TRIAL**

Now comes the defendant Ross McLellan, by and through undersigned counsel, and hereby respectfully moves this Honorable Court for leave to file his 27-page motion, attached hereto as Exhibit 1, renewing and supplementing his prior Motion for Judgment of Acquittal and, alternatively, requesting a new trial. As grounds and reasons therefor, Mr. McLellan states that additional pages are necessary to fully address the factual and legal issues raised by the three-week trial in this matter.

WHEREFORE, the defendant respectfully requests that the instant motion be allowed.

Local Rule 7.1(a)(2) Certification

The undersigned counsel conferred with counsel for the Government and the Government, by and through Stephen E. Frank, does not oppose this request for leave to file. The Government does, however, oppose the request for judgment of acquittal or a new trial.

Respectfully submitted,

Ross McLellan
By his Attorney,

/s/ Martin G. Weinberg
Martin G. Weinberg
Mass. Bar No. 519480
20 Park Plaza, Suite 1000
Boston, MA 02116
(617) 227-3700
owlmgw@att.net

Dated: July 10, 2018

CERTIFICATE OF SERVICE

I, Martin G. Weinberg, hereby certify that on this date, July 10, 2018, a copy of the foregoing document has been served via Electronic Court Filing system on all registered participants.

/s/ Martin G. Weinberg
Martin G. Weinberg